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2 [Submitting Counsel on Signature Page]  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR  
MDL No. 3047

This Document Relates to: Covington  
Independent School District, by and  
through the Board of Education of  
Covington, Kentucky

LOCAL GOVERNMENT AND SCHOOL  
DISTRICT MASTER SHORT-FORM  
COMPLAINT AND DEMAND FOR JURY  
TRIAL

Member Case No.:  
4:23-cv-02416-YGR

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local Government and School District Complaint* ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case Management Order No 8.

1 Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of  
2 Actions specific to Plaintiff(s)' case.

3 Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

4 **I. DESIGNATED FORUM**

5 1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s)  
6 would have filed in the absence of direct filing:

7 United States District Court for the Eastern District of Kentucky  
\_\_\_\_\_

8 2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s)  
9 originally filed and the date of filing:  
\_\_\_\_\_

10 **II. IDENTIFICATION OF PARTIES**

11 **A. PLAINTIFF(S)**

12 3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims against  
13 Defendant(s):  
\_\_\_\_\_

14 Covington Independent School District, by and through the Board of Education of  
15 Covington, Kentucky  
\_\_\_\_\_

16 4. Number of schools served in the Plaintiff(s)' school district or local community: 11  
17 5. Number of minors served in the Plaintiff(s)' school district or local community: 3,743  
18 students as of the 2021 – 2022 school year.  
\_\_\_\_\_

19 6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident and  
20 citizen of Kentucky.  
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3 **B. DEFENDANT(S)**

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7 Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

5 **META ENTITIES**

6  META PLATFORMS, INC.,  
7 *formerly known as Facebook, Inc.*

8  INSTAGRAM, LLC

9  FACEBOOK PAYMENTS, INC.

10  SICULUS, INC.

11  FACEBOOK OPERATIONS, LLC

12  FACEBOOK HOLDINGS, LLC

13  META PAYMENTS, INC.

5 **TIKTOK ENTITIES**

6  BYTEDANCE LTD

7  BYTEDANCE INC.

8  TIKTOK LTD

9  TIKTOK LLC

10  TIKTOK INC.

11 **SNAP ENTITY**

12  SNAP, INC.

13 **GOOGLE ENTITIES**

14  GOOGLE, LLC

15  YOUTUBE, LLC

16

17 **OTHER DEFENDANTS**

18 For each “Other Defendant” Plaintiff(s) contends are additional parties and are liable  
19 or responsible for Plaintiff(s)’ damages alleged herein, Plaintiff(s) must identify by  
20 name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts  
21 supporting any claim against each “Other Defendant” in a manner complying with the  
requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may  
attach additional pages to this *Short-Form Complaint*.

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	<b>NAME</b>	<b>CITIZENSHIP</b>
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1      **III. CAUSES OF ACTION ASSERTED**

2      8. The following Causes of Action asserted in the *Master Complaint*, and the allegations  
3      with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all*  
4      *that are adopted*):

5 <b>Asserted Against<sup>1</sup></b>	6 <b>Count 7      Number</b>	8 <b>Cause of Action (COA)</b>
9 <input checked="" type="checkbox"/> Meta entities 10 <input checked="" type="checkbox"/> Snap 11 <input checked="" type="checkbox"/> TikTok entities 12 <input checked="" type="checkbox"/> Google entities 13 <input type="checkbox"/> Other Defendant(s) <sup>2</sup>	1	NEGLIGENCE
14 <input checked="" type="checkbox"/> Meta entities 15 <input checked="" type="checkbox"/> Snap 16 <input checked="" type="checkbox"/> TikTok entities 17 <input checked="" type="checkbox"/> Google entities 18 <input type="checkbox"/> Other Defendant(s)	2	PUBLIC NUISANCE

19      **NOTE**

20      If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph  
21      8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those  
22      additional Cause(s) of Action, must be pled in a manner complying with the requirements of the  
23      Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this  
24      *Short-Form Complaint*.

25      **IV. ADDITIONAL CAUSES OF ACTION**

26      9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting  
27      allegations against the following Defendants:

28      N/A
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22      <sup>1</sup> For purposes of this paragraph, “entity” means those Defendants identified in Paragraph 7 (e.g.,  
23      “TikTok entities” means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

24      <sup>2</sup> Reference selected “Other Defendants” by the corresponding row number in the “Other  
25      Defendant(s)” chart identified in Paragraph 7.

1                   **WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants and all  
2 such further relief that this Court deems equitable and just as set forth in the *Master Complaint*,  
3 and any additional relief to which Plaintiff(s) may be entitled.  
4

5                   **JURY DEMAND**

6 Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

7                   \*\*\*\*\*

8 By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority  
9 and jurisdiction of the United States District Court of the Northern District of California and  
10 oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as  
11 necessary through sanctions and/or revocation of *pro hac vice* status.

12                   /s/ Ronald E. Johnson, Jr.  
13                   Ronald E. Johnson, Jr.  
14                   Hendy Johnson Vaughn Emery PSC  
15                   600 West Main Street, Suite 100  
16                   Phone: 859/578-4444  
17                   Fax: 859/578-4440  
18                   Email: [rjohnson@justicestartshere.com](mailto:rjohnson@justicestartshere.com)

19                   *Attorneys for Plaintiff*

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